



October 29, 2003

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EX PARTE – VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: CC Docket No. 96-45
Notice of Oral and Written Ex Parte Presentation

Dear Ms. Dortch:

Yesterday, I met separately with Jessica Rosenworcel, Legal Advisor to Commissioner Copps, and Chris Libertelli, Senior Legal Advisor to Chairman Powell. The substance of the presentation is reflected in the attached documents, copies of which were provided in the meeting.

In addition to the attached summary, GCI also emphasized that the goals of basic universal service would be met, and sustainability of the fund would be served, through the implementation of a primary line restriction. To the extent that implementation issues have not been resolved, adoption of the principle now will provide the incentive and opportunity for such issues to be resolved prior to the end of the RTF. GCI also identified a series of unexamined questions regarding ILEC assertions of COLR costs, as set forth in the attached. These questions and their responses demonstrate that ILEC assertions about COLR costs do not provide any justification for the adoption of non-competitively neutral universal service policies, like unequal per-line support. Finally, GCI stated its support for a connections-based contribution plan to assess universal service obligations on as broad of a base as possible, without favoring one technology or industry segment over another, and identified telephone number plans as a suitable means of implementing a contributions methodology.

In accordance with the Commission's rules, a copy of this letter with attachments is being filed in the above-captioned proceeding.

Sincerely,

/s/

Tina M. Pidgeon
Vice President, Federal Regulatory Affairs

Attachments